

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

**KIMBERLY HARTMAN,**  
*Plaintiff*

v.

**CENTRA HEALTH, INC., et al,**  
*Defendants.*

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**CASE NO. 6:20CV00027**

**COUNTERCLAIM DEFENDANT KIMBERLY HARTMAN'S JOINT MOTION FOR A  
MORE DEFINITE STATEMENT OF CENTRA'S COUNTERCLAIMS AND TO STRIKE  
CERTAIN IRRELEVANT, IMMATERIAL, IMPERTINENT AND SCANDALOUS  
MATERIAL FROM THE COUNTERCLAIMS**

COMES NOW the Counterclaim Defendant, Kimberly Hartman, by counsel, by joint motion pursuant to Rule 12(g), to move the Court (i) to order Counterclaimant Centra Health, Inc. to provide a more definite statement of its counterclaims under Rule 12(e) and (ii) to strike certain irrelevant, immaterial, impertinent and scandalous matter from the counterclaims under Rule 12(f) for the reasons provided in the accompanying Memorandum in Support of this Motion.

Respectfully submitted,

**KIMBERLY HARTMAN**  
**By Counsel**

By: /s/ M. Paul Valois

**M. Paul Valois (VSB No. 72326)**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of September, 2021, I electronically filed the foregoing Memorandum with the Clerk of this Court using the CM/ECF system, which will automatically send notice of this filing to all counsel of record.

/s/ M. Paul Valois